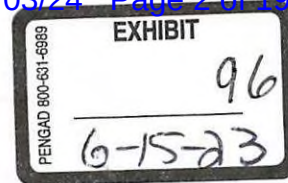


EXHIBIT 54



TITLE IX: FALLING SHORT AT 50

Female athletes stiffed on scholarships at some of the biggest colleges in the country

Kenny Jacoby Rachel Axon Lindsay Schnell Steve Berkowitz USA TODAY

Published 2:00 AM PDT Aug. 17, 2022 Updated 2:34 AM PST Dec. 15, 2022

To salute the 50th anniversary of Title IX and its women's sports program, the University of South Florida created a video this spring featuring highlights, photos and a by-the-numbers commemoration of achievements by its female athletes: NCAA and conference championships won, All-American honors received, USF Athletics Hall of Fame honorees named.

Left unsaid: USF was shortchanging the same athletes under the very law it celebrated.

In 2020-21, USF gave more athletic scholarship money to its football team of 117 players than to the 204 athletes on its 10 women's teams combined. Altogether, the school stiffed female athletes by nearly \$900,000 in scholarships that year, in violation of Title IX, the federal law prohibiting sex discrimination in education, a USA TODAY investigation found.

About the series

USA TODAY's "[Title IX: Falling short at 50](#)" exposes how top U.S. colleges and universities still fail to live up to the landmark law that bans sexual discrimination in education. Title IX, which turned 50 this summer, requires equity across a broad range of areas in academics and athletics. Despite tremendous gains during the past five decades, many colleges and universities fall short, leaving women struggling for equal footing.

Title IX requires schools to distribute athletic scholarship dollars equitably, but such disparities have existed at USF each of the past 18 years – as far back as public data is available. To comply with Title IX, the Bulls would have needed to give women an additional \$11 million in athletic scholarships over that time.

"It's insanely frustrating," said Karen-Kay Lyvers, a former USF track and field athlete who racked up nearly \$20,000 in student loans despite earning a partial athletic scholarship during her two years at the school.

She lamented that, while many female athletes struggle, some male athletes "who don't even get their uniforms dirty at games (are) able to coast through college with no debt, even though they don't contribute to the school or conference or score points."

Lyvers, who transferred to Wichita State University in 2020, told USA TODAY she had no idea about Title IX's scholarship equity requirement or that her college openly skirted it.

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCPSPPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

"Why don't they tell us that?" she said.

Each year, thousands of the nation's top college female athletes, like Lyvers, get the short end of the same stick.

The majority of public schools that competed in the NCAA's Football Bowl Subdivision – the highest echelon of college sports – failed to comply with Title IX's scholarship requirement, USA TODAY's investigation found.

Unlike some Title IX requirements that are subjective and complex, the calculation for its scholarship requirement is relatively straightforward. U.S. Department of Education policy says the percentage of athletic scholarship dollars a college awards male and female athletes must fall within 1 percentage point of their representation in the athletic department.

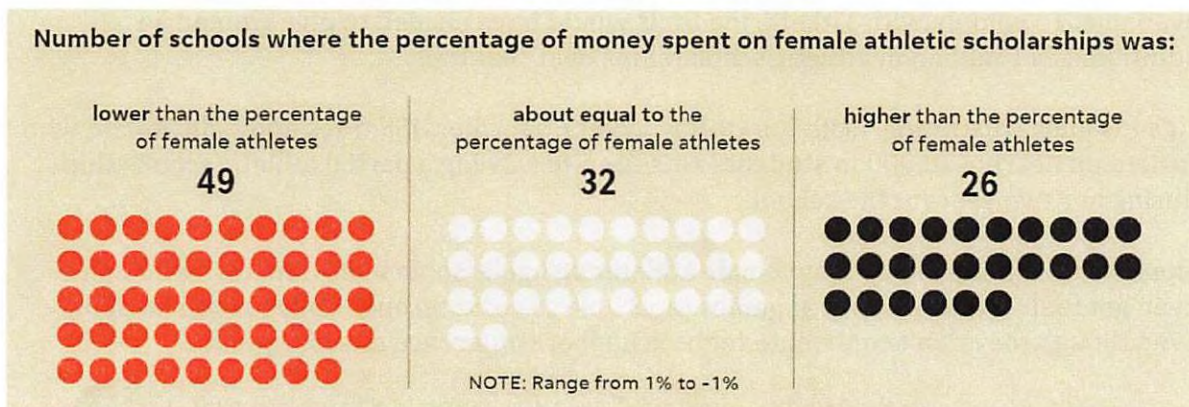
A school where 45% of athletes are women, for instance, must give them between 44% and 46% of its athletic financial aid.

But of 107 FBS public universities analyzed by USA TODAY, only 32 complied with the requirement, data the schools reported to the Department of Education and NCAA show. Forty-nine of them underfunded athletic scholarships for women. The other 26 underfunded men's scholarships, but in nearly every case it was because they had so few women athletes in the first place.

The schools that underfunded women would have needed to give them \$23.7 million more in athletic scholarships in 2020-21 alone to comply with the law, the analysis found – nearly a half-million per school.

Where schools have fallen short of Title IX scholarship requirements

Title IX says schools must distribute scholarship dollars equitably among male and female athletes. Of the 107 schools in the USA TODAY analysis, about 30% met that requirement.



Only the University of New Mexico reported a wider gap for female athletes than USF. Although 50.5% of its athletes were women, New Mexico awarded them just 41.7% of athletic scholarship money – a \$1.25 million shortfall. The average Lobos male athlete received \$23,700, while the average Lobos female athlete got \$16,600.

In a statement, New Mexico touted its progress on Title IX in recent years and said the reason for its disparity was nondiscriminatory. It declined to answer further questions.

The Department of Education permits differences greater than 1 percentage point if they can be explained by nondiscriminatory factors. For instance, some schools told USA TODAY they spent more on scholarships for male athletes because more of them came from out of state, so their tuition costs were higher. The department might consider that a nondiscriminatory factor, assuming the school did not discriminate against female athletes by devoting more recruiting resources toward men's teams.

Other schools told USA TODAY the scholarship numbers they submitted to the Department of Education and NCAA should not be used at all to assess their Title IX compliance because they baked in some costs – such as summer school tuition – that the department would exclude from a compliance assessment. Despite gender disparities in their public-facing numbers, some of these schools said they keep their correct numbers internal, and that those numbers showed them in compliance.



“For many athletes, an athletic scholarship can make the difference between being able to go to school or not. In addition to sending a message to women about how they’re valued, this is real money that makes a real difference in people’s lives.”

Neena Chaudhry, general counsel for the National Women’s Law Center

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCPSPPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

"For many athletes, an athletic scholarship can make the difference between being able to go to school or not," said Neena Chaudhry, general counsel for the National Women's Law Center, which has litigated dozens of Title IX cases on behalf of female athletes. "In addition to sending a message to women about how they're valued, this is real money that makes a real difference in people's lives."

As increasingly more students grapple with the rising costs of college and amass more debt as a result, the disparate treatment is even worse for athletes of color, who disproportionately have struggled to afford higher education without financial aid.

"Women of color, we're always getting screwed," said Shamier Little, the rare track athlete on a full scholarship when she ran for Texas A&M University from 2013 to 2016. Most of her teammates, she said, had to pay their way through school, at least partially.

"Growing up, all my mama talked about was how she wouldn't wish college debt on her worst enemy," said Little, who left school early to go pro. Adidas, her sponsor, paid for her to finish her degree.



Shamier Little, who attended Texas A&M on a rare full scholarship as a track athlete

"Women of color, we're always getting screwed."

KIRBY LEE, USA TODAY SPORTS

The findings underscore how the playing field at many of the universities with the largest and wealthiest sports programs remains uneven for female athletes, 50 years after the

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCPSPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

landmark civil rights law was enacted. Closing the gap, however, is not quite as simple as writing more women bigger checks.

Scholarship limits that NCAA schools imposed on themselves 40 years ago make it difficult to distribute the dollars equitably. While those limits let schools place up to 85 football players on full-ride scholarships, no women's sport has a limit higher than 20.

USF, for example, funded scholarships for each of its women's teams at nearly the full capacity that NCAA rules permit. Giving them the additional \$900,000 necessary to comply with Title IX would have pushed them over the limits and subjected the teams to penalties, including championship bans, scholarship reductions, and athletes being ruled ineligible.

This year, for the first time in two decades, USF announced it will add two new women's teams over the next three years – a move that will create the capacity for 20 more full-ride scholarships. Even so, it's not clear that will be enough to bring USF into Title IX compliance.

"USF Athletics has historically expanded opportunities and support for female student-athletes and continues to do so with the recent additions of a women's lacrosse program and a women's beach volleyball program that increase our total of varsity women's sports teams to 12 – all of which are fully funded for available scholarships under NCAA rules," associate athletic director Brian Siegrist told USA TODAY in an emailed statement.

The data the school submits to the Department of Education, Siegrist said, "does not provide a complete picture in regards to USF's support for female student-athletes."



The University of South Florida is located in Tampa and has nearly 30,000 undergraduate students on its campus each year.

AIMEE BLODGETT, UNIVERSITY OF SOUTH FLORIDA

Yet dozens of other universities decide again and again to adhere to NCAA rules and violate federal law, at the expense of female athletes. It's a choice experts criticize as morally and legally wrong. But given that NCAA enforcers have proven far more likely than the Department of Education to punish schools, experts said, the practice continues.

In its history, the Education Department has never revoked a school's federal funding over Title IX violations. Despite annually collecting data from thousands of colleges that point to obvious offenders, it rarely, if ever, investigates them proactively. And the department's staff of investigators, who must handle thousands of complaints across a range of issues including Title IX, decreased from 417 in 2011 to 334 in 2021, according to the department's budget request for fiscal year 2023.

Aggrieved athletes are left to figure out the rules themselves, assess if their own schools are breaking them and file a complaint with the department or hire lawyers to sue their institutions.

"The idea that somehow NCAA rules could be used as a defense in terms of violating a federal law is quite astonishing by itself," said Ellen Staurowsky, a professor of sports media at Ithaca College who studied the issue for the nonprofit Women's Sports Foundation. "But I think it's also telling because the NCAA will penalize the school if it's in violation of its rules.

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCPSPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

"The federal government has not."

0:00

5:01

AD

Title IX: 'Revolutionary' legislation, but inequalities still exist 50 years later(5:01)

JASPER COLT AND HANK FARR, USA TODAY

NCAA scholarship limits hurt women

In February, 17 current and former members of San Diego State University's women's rowing and track and field teams sued their school, alleging it violated Title IX for more than a decade by underfunding scholarships for female athletes.

In an April motion to dismiss the lawsuit, San Diego State said its hands were tied because NCAA scholarship limits precluded it from providing women more money.

The legal dispute, which remains ongoing, illuminates the inherent Title IX conflict NCAA limits create.

Unlike the majority of FBS public universities, San Diego State indisputably complied with a different Title IX standard: It provided men and women opportunities to play sports at rates proportional to their enrollment. Its student body and athlete population were both 57% female in 2020-21.



San Diego State University was sued this year by current and former female athletes who allege SDSU violated Title IX for more than a decade by underfunding scholarships for female athletes.
DENIS POROY, AP

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCPSPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

Achieving proportionality required the Aztecs to sponsor twice as many women's teams as men's to offset their 113-man football roster. San Diego State sponsored women's basketball, cross country, golf, lacrosse, soccer, softball, swimming and diving, tennis, volleyball and water polo, in addition to rowing and track and field.

But NCAA limits capped the number of scholarships it could offer the women. For all 12 women's sports combined, San Diego State had up to the equivalent of 139 full-ride scholarships to divvy among its 305 female athletes. For male athletes, that ceiling was 128.6 – almost as many scholarships, despite the Aztecs sponsoring just six men's teams, with 228 athletes.

Therein lies the problem. If San Diego State had maxed out its limits for both sexes, only 51.9% of its total scholarship money would have gone to women – roughly 5 percentage points short of what Title IX required.

“That’s not a justification for discriminating against women,” Chaudhry said. “If there’s a rule that schools think is hampering their ability to comply, then they need to figure out how to have that rule changed or how to comply nevertheless.”

San Diego State did not respond to multiple emails requesting comment.

“This lawsuit is in no way us saying we’re ungrateful for the experience we’ve had,” said Carina Clark, a track athlete and plaintiff in the case. “I think I can speak for all of us when I say we’ll remember it for the rest of our lives. This is ultimately about what we can do to change things for those coming after us. What SDSU is doing isn’t right.”

Why were scholarship capacities for male and female athletes nearly equal at San Diego State, when it had six fewer men's teams than women's? The answer, as it so often is in questions of equity in college sports, is football.

The NCAA scholarship limit for FBS football teams is 85 full-ride equivalents. No other NCAA men's or women's sport comes close.

Rowing and track and field are the only women's sports with average roster sizes that approach football's, but their scholarship limits pale in comparison. Their respective limits are 20 and 18, even though teams of 100-plus female rowers and 60-plus female track and field athletes are common.

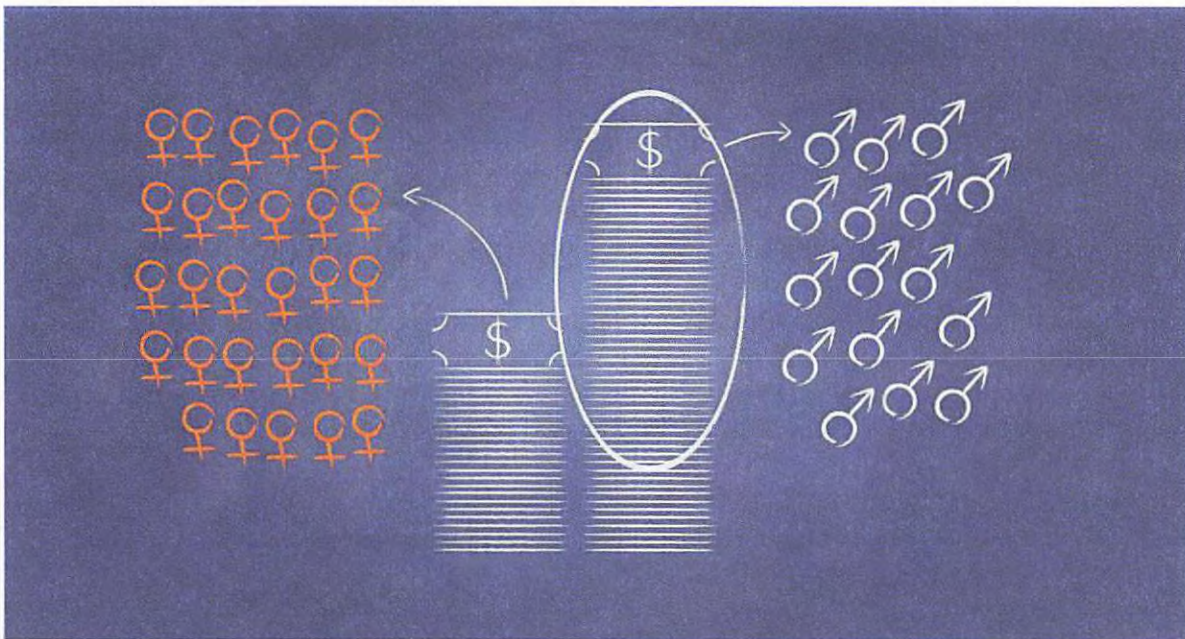
For soccer and softball – two of the nation's most popular women's sports – the limits of 14 and 12, respectively, barely allow for enough full-rides to field a starting lineup.

Scholarship limits for most common men's and women's sports

"Eighty-five players on a football team is ridiculous," said David Berri, an economics professor at Southern Utah University. "You only play 22 of them. You don't need four strings."

Over the years, various college football coaches and athletics administrators have countered that 85 scholarships are necessary because of the sport's injury rate and because college teams can't just add players during a season to replace those who get hurt, the way NFL teams do.

They've also expressed concern that, without 85 scholarships available, the quality of play would suffer, fan and commercial interest would decline and the sport would not generate the revenue that it does.



5 charts show athletic scholarships' bias toward football – and against women

[Explore the graphics](#)

While NCAA scholarship limits are lower for men's teams than women's teams of the same sport, those differences do little to close the football gap.

Of the 107 universities analyzed by USA TODAY, the total scholarship capacity was higher for men's teams than women's at 104 of them. Only San Diego State, Eastern Michigan University, and the University of California, Berkeley, had higher capacities for women.

Additionally, just because schools can award that many scholarships doesn't mean all of them can afford to. Eighty-five FBS public universities did not fully fund women's scholarships in 2020-21, USA TODAY found.

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCSPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

The limits are unfair to both women and men, said Barbara Osborne, a University of North Carolina at Chapel Hill sport administration professor who studied the issue in 2017.

Soccer, she noted, is one of the most popular youth sports in the country, but under NCAA limits, schools have only two dozen soccer scholarships for men and women combined.

Efforts have been made to increase scholarship limits for some women's sports since schools first adopted them in 1982-83 – the year after the NCAA started sponsoring women's championships. But the schools collectively voted down most of those proposals, and successful ones barely moved the needle.

Over the past 25 years, schools have voted to increase limits for women's soccer by three; track and field and gymnastics by two; and field hockey, lacrosse, and softball by one each. The last increase came in 2006, though the NCAA has since added beach volleyball as a championship sport.



US Youth Soccer, the largest youth sport organization in the country, says it registers nearly 3 million players annually. Additionally, nearly 1 million kids play soccer in high school, according to the National Federation of State High School Associations. TOM DORSEY AP

NCAA governing bodies recently have discussed the prospect of ending scholarship limits altogether. But so far, no proposals have been formally submitted for a vote.

In a statement to USA TODAY, the NCAA stressed that its member schools – not its national office – propose and adopt scholarship limits.

"If any member school is concerned that these rules are prohibiting them from complying with Title IX, they are encouraged to sponsor additional women's sports on campus and/or propose new rules at any time to allow for greater support," the statement said.

Without the NCAA or Department of Education actively enforcing compliance with the law, UNC's Osborne said, it's unlikely schools will suddenly start holding themselves accountable.

"There's not a large number of schools that are actually in compliance, so there's not going to be a majority that would get that legislation passed," she said.

"They have no incentive for doing that."

Female athletes denied opportunities

Dozens of FBS schools landed within Title IX's required 1 percentage point range on scholarships, despite NCAA limits that can make compliance difficult.

Most of those schools, however, denied female athletes fair representation to start, which made compliance for them easy.

Take Arkansas State University, a school whose enrollment in 2020-21 was 60% female. Only 39% of its athletes were women.

Arkansas State would have needed to more than double its number of female athletes, 131, for them and their male counterparts to have received equitable participation opportunities. But it gave women 39% of athletic scholarship money – squarely within the 1 percentage point range.

The school acknowledged USA TODAY's request for a comment but did not provide one.

The Department of Education's formula for assessing scholarship equity, experts say, bakes in discrimination.



Title IX aimed to get women into grad schools. Over 50 years, it shaped their role in sports.

Explore the timeline

"That's such an insane way of doing it," said Berri, the SUU professor. "You're saying, 'I discriminated. That means I get to discriminate on scholarships, as well, because I already started off discriminating.' That's crazy."

The formula would work just fine if Title IX guaranteed women adequate representation in athletic departments. But it doesn't.

While Title IX requires schools to provide women and men "equitable" opportunities to play sports, the Department of Education offers them three ways to demonstrate they are doing so.

Proportionality – meaning the percentage of participation opportunities they offer female athletes roughly equals the percentage of their undergraduate students who are women – is the surest way.

The other two ways – showing they are steadily moving in that direction, and showing their existing sports offerings meet their students' abilities and interests – give schools outs that allow them to continue discriminating.

[A USA TODAY analysis found](https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCSPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static) 87% of FBS schools did not meet the proportionality standard in 2020-21. Most, including Arkansas State, did not answer a USA TODAY survey asking if

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCSPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

they comply with Title IX's participation equity requirement and, if so, which of the three ways they use to comply.

"You have to create the participation opportunities and provide the financial aid opportunities in order to achieve compliance with the spirit of the law," Osborne said. "If you're still not in participation-opportunity compliance, yay that you're giving women enough money, but you're still not providing enough opportunities for women."

The imbalance in participation opportunities creates a facade that dozens of schools give female athletes too much scholarship money. In reality, those schools simply don't have enough female athletes.



University of Nebraska athletes train in Lincoln, Neb., on Aug. 12, 2020.
THE ASSOCIATED PRESS

At the University of Nebraska, for instance, men accounted for 59% of athletes in 2020-21 but received 53% of scholarship money – a 6 percentage point gap that put it out of Title IX compliance. But men comprised 51% of the student body, meaning they already received more than fair share of opportunities.

When female athletes lack fair representation, said Andrew Zimbalist, a sports economist at Smith College, "there's no question that the discrimination becomes compounded."

"The level of scholarships, the level of different kinds of treatment and facilities, isn't relevant if people aren't playing sports," Zimbalist said. "If you're not playing sports, there's no scholarship to be had."



Catherine Lhamon, assistant secretary of the Office for Civil Rights in the Department of Education.
LESLIE B. WILLIAMS, U.S. DEPARTMENT OF EDUCATION

The Department of Education did not answer specific questions about its standards on proportionality and scholarships. In a statement to USA TODAY, assistant secretary Catherine Lhamon highlighted progress for women in Title IX's first 50 years.

"The Department is fully committed to continuing this progress and ensuring there is robust support for collegiate women's sports," Lhamon's statement said. "Congress requires every school to do its own work to meet its Title IX obligations in the classroom and on the sports field so all students have equal opportunities to thrive.

"We will continue to educate schools on ways to ensure compliance with the law and are prepared to ensure rigorous enforcement against claims of sex discrimination of any kind."

'Don't look behind the curtain'

The Department of Education typically investigates a school only when a member of the public, such as an athlete, parent or coach, files a complaint presenting evidence of sex discrimination.

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCSPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

But that's hard to do when such evidence is scant. Despite the federal Equity in Athletics Disclosure Act requiring universities to report data – including those on scholarships – to the federal government, the Department of Education's public-facing database contains numbers that often are inaccurate or misleading. When USA TODAY contacted 20 FBS colleges about gender disparities in their reported numbers, many said the data was wrong or couldn't be used to assess Title IX compliance.

San Diego State argued as much in its response to the female rowers and track and field athletes' federal lawsuit. Louisiana State University made a similar claim in response to USA TODAY's questions.

LSU's public-facing data showed 50.1% of its athletes were female in 2020-21 but that it gave them only 45.3% of scholarship money – a \$960,000 shortfall. Cody Worsham, the athletic department's chief brand officer, told USA TODAY that, to the contrary, LSU was perfectly in compliance that year.

"Without having seen the specific data set you've utilized, it is likely your analysis has failed to account for information that is excluded from Title IX financial aid scholarship analysis," Worsham said. "Our numbers for 2020-21 are within the 1% deviation of participation and scholarships extended by gender as required by federal law.

"Any reporting to the contrary would be inaccurate."



Louisiana State University, located in Baton Rouge, Louisiana, shorted female athletes by nearly \$1

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCPSXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

million on scholarship money, according to its public-facing data. But the school said those numbers are wrong and that it complies with Title IX.
SCOTT CLAUSE, USA TODAY NETWORK

It's true that small differences can exist between the public-facing numbers and the numbers the Department of Education would use to assess a school's Title IX compliance, said Arthur Bryant, an attorney representing the San Diego State athletes – but not the types of massive differences LSU described.

"That's a good approach – 'Don't look behind the curtain!'" Bryant said, chuckling. "Yes, there can be minor differences. But they're very unlikely to give you a false perception of what's happening."

Upon further questioning by USA TODAY, Worsham acknowledged LSU's reported numbers were incorrect. For example, rather than report the exact dollar amounts it awarded male and female athletes on its track and field and swimming and diving teams that year, it took the combined amounts it gave to men and women on those teams and divided the totals by two. No other Southeastern Conference school reported its numbers that way.

USA TODAY contacted athletic directors, athletics compliance directors and sports information directors at 19 other FBS public schools whose public-facing data showed the highest levels of discrimination against women. Each school's percentage of athletes who were female was at least 3.5 points higher than the percentage of scholarship money they received.

Asked why they fell outside of the required 1 percentage point range in 2020-21, their answers ran the gamut:

- Two schools – Boise State University and Georgia State University – admitted they did not comply with Title IX's scholarship requirement. Both said their numbers were thrown off by an NCAA rule adopted in response to the coronavirus pandemic that gave some athletes an extra year of eligibility.
- Georgia State additionally said its reported numbers were incorrect and provided updated numbers, which showed it was still out of compliance but by less. LSU and East Carolina University also provided alternative numbers, which showed LSU squarely in compliance and ECU off by half a percentage point.
- New Mexico, the University of Wyoming, Ohio University and the University of Nevada, Las Vegas, said their gaps – all greater than 4.5 percentage points – were explained by permissible, nondiscriminatory reasons. For instance, they said a greater share of their male athletes came from out of state or attended summer school, while more female athletes received non-athletic academic aid.
- Eastern Michigan University said it complied with "all aspects of Title IX" and provided no explanation for its disparity. The school's athletics program currently operates under a consent decree and monitoring by a court-appointed referee. The decree resolved a Title IX lawsuit filed four years ago. The referee's first report, in

https://www.usatoday.com/in-depth/news/investigations/2022/08/17/female-athletes-stiffed-scholarship-money-colleges-title-ix/7640647001/?gps-source=BRNMSVCPSPPXXTITLEIX&itm_source=usat&itm_medium=onsite-spike&itm_campaign=titleix-storytellingstudio-n&itm_content=static

August 2021, said the university was making satisfactory progress and working in good faith to comply.

- USF, Central Michigan University and New Mexico State University did not dispute their noncompliance but did not answer USA TODAY's question. They provided statements touting their progress on Title IX in the past 50 years and compliance with the law in other areas.
- San Diego State, Florida International University, Utah State University, Miami University of Ohio, Appalachian State University and Bowling Green State University did not respond to multiple emails. University of Minnesota officials did not respond after initially asking for more time, which USA TODAY granted.
- Michigan State University, which was sued for Title IX violations by female athletes last year, declined to comment, citing pending litigation.

Requiring schools to report numbers was supposed to be "the first step to increase compliance with Title IX," then-U.S. Rep. Cardiss Collins said in a 1993 subcommittee hearing during which she introduced the bill that became the Equity in Athletics Disclosure Act.

Nearly 20 years later, the Department of Education says the law is not supposed to be used to assess Title IX compliance – but rather, for prospective students to assess if a school is committed to providing "equitable opportunities."

The unreliability of schools' self-reported numbers adds yet another obstacle for athletes like Lyvers, who had little understanding of Title IX's requirements and was already struggling to make ends meet.

"There was not one semester where I wasn't incredibly stressed and scraping together money to be able to register for classes," Lyvers told USA TODAY.

It shouldn't be the responsibility of female athletes, she said, to learn the law and force their schools to treat women fairly.

"I think the main thing people, including athletes, don't realize is this is a business," Lyvers said. "No one prepares you for how it works."